

Exhibit

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Signature of Deponent Ronald H. Hargrove

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

RENALDO NAVARRO,)	CERTIFIED COPY
)	
Plaintiff,)	
)	
vs.)	Case No.
)	3:19-cv-08157-VC
MENZIES AVIATION, INC., DOING)	
BUSINESS AS MENZIES; and)	
DOES 1 through 10, inclusive,)	
)	
Defendants.)	
_____)	

Webex deposition of RENALDO NAVARRO, VOLUME I,
taken remotely on behalf of the Defendant, beginning at
9:41 a.m. and ending at 4:23 p.m., on Thursday,
July 23, 2020, before JOANNA B. BROWN, Certified
Shorthand Reporter No. 8570, RPR, CRR, RMR.

1 again.

2 MR. WARD: Sure.

3 Q Is it your belief that if you make legal
4 claims against a former employer, you are likely to get
5 a settlement from them regardless of the merit of those
6 claims?

7 A Yes, sir.

NO, SIR

8 MR. URIARTE: Mr. Navarro, are you
9 understanding the Tagalog interpretation?

10 THE WITNESS: (Inaudible.)

11 MR. URIARTE: You have to answer in Tagalog.

12 MR. URIARTE: Yeah. I mean, I have --

13 THE INTERPRETER: Just a second. Let me
14 interpret that.

15 THE WITNESS: It seems it's far from my
16 understanding in Tagalog.

17 MR. URIARTE: I think -- Ms. Carrera, I
18 understand your proficiency and your amazing use of the
19 official, traditional, government-level Tagalog, but
20 it's sure not what usual, normal people in Tagalog
21 would use in the street. There are two forms of
22 Tagalog. There's the Tagalog that is normally used
23 around the country by normal people, but when you use
24 words like (speaks Tagalog) -- I went to a university
25 there, and I spoke formal Tagalog; but normal people

1 Q Did I understand you correctly that you worked
2 for ASIG -- you've had two different periods of time
3 where you were employed by ASIG?

4 A What do you mean two different times?

5 Q So let me do it this way: First you -- first
6 you started at Service Air; right?

7 A Yes, sir.

8 Q And did you remain employed by Service Air up
9 to when Swissport purchased Service Air?

10 THE INTERPRETER: Please repeat the question.

11 MR. WARD: Sure.

12 From when he started at Service Air until the
13 purchase by Service Air of Swissport, was he
14 continuously employed by Service Air?

15 THE WITNESS: Yes, it was continuous.

16 BY MR. WARD:

17 Q Okay. And then, when you started your
18 employment with ASIG in approximately 2016, was that
19 the first time you had worked for ASIG?

20 A What I did was work in 2005 at ASIG up to 2016
21 when Menzies purchased ASIG, and I continuously worked
22 for them. *OK - changes immaterial*

23 Q I see. You were working for both Service Air
24 and ASIG at the same time?

25 A Yes, sir. I'm sorry. Different. They were

1 involving nonsupervisory employees in personal
2 grievances?

3 A Yes, sir.

4 Q As a supervisor, should you avoid pressuring
5 employees to get involved in personal grievances?

6 A Will you please repeat the question again.

7 Q Sure. As a supervisor, is it important to
8 avoid pressuring employees, nonsupervisory employees,
9 to get involved in personal grievances?

10 MR. URIARTE: Before you answer that question,
11 Mr. Navarro, remember the instruction earlier. If you
12 do not understand the question that is said in Tagalog,
13 indicate that if you are having a problem with the
14 Tagalog interpretation. Do say that so that we know
15 where the problem is. I just want to make sure that
16 you do that. Okay? Great, Mr. Navarro.

17 THE INTERPRETER: This is the interpreter
18 speaking. I would like to have the question, please,
19 repeated.

20 MR. WARD: Sure.

21 Q My question is, in your opinion, should a
22 supervisor avoid pressuring nonsupervisory employees to
23 become involved in personal disputes?

24 A No, sir.

Yes, sir

25 Q Why not?

1 BY MR. WARD:

2 Q Do you recall receiving this document?

3 A No, sir.

4 Q Do you recall calling in sick in March of 2009
5 before your days off?

6 A ~~Yes~~ ^{NO}, sir.

7 MR. URIARTE: You have to get your
8 questions -- you can't talk to me. You have to get
9 your questions from him. If you need a break, you just
10 ask for a break.

11 THE WITNESS: No, sir.

12 MR. WARD: All right. We are going to mark
13 this as Exhibit 5.

14 (Deposition Exhibit 5 was marked for
15 identification by the reporter, a
16 copy of which is attached hereto.)

17 BY MR. WARD:

18 Q This is a two-page document as well. So
19 please let me know when you've had a chance to see the
20 first page, and I'll move to the second one.

21 A Yes, sir.

22 THE INTERPRETER: Mr. Navarro said yes.

23 BY MR. WARD:

24 Q All right. Let me know when you've had a
25 chance to review this page as well.

1 BY MR. WARD:

2 Q How did you first learn about that petition?

3 A They passed it to me when they were -- after
4 they signed, they were passing that petition.

5 MR. URIARTE: Wait. I have to object on the
6 interpretation there. You might want to ask the
7 witness to state his response again because that's
8 definitely -- I think your English portion of that
9 interpretation is erroneous.

10 (Interpreted.)

11 THE WITNESS: Yes, sir.

12 MR. URIARTE: You have to -- can you provide
13 the answer again.

14 THE WITNESS: Please repeat your question.

15 BY MR. WARD:

16 Q My question was how did you first learn about
17 that petition?

18 A I learned from the people that they were
19 passing a petition against Andrew.

20 Q When you say the "people," who specifically
21 are you referring to?

22 A The fuelers, those who put the gasoline.

23 Q Okay. And when you learned that it was being
24 passed around, did somebody ask you to sign it?

25 A ~~They told me~~ ^{Yes, to sign it.} ~~They told me.~~

1 BY MR. WARD:

2 Q Anybody else you can identify by name who
3 asked you to sign the petition?

4 A I forgot the others, but it was Jazen and
5 Rafael.

6 Q Did you sign the petition?

7 A Yes, sir.

8 Q Did you think it was appropriate to get
9 involved in a petition against another supervisor?

10 MR. URIARTE: Objection. Vague and calls for
11 a legal conclusion.

12 You can answer, Mr. Navarro. You can answer
13 after my objection.

14 THE WITNESS: Please repeat the question.

15 BY MR. WARD:

16 Q The question was did you think it was
17 appropriate to sign a petition against another
18 supervisor?

19 MR. URIARTE: Same objection.

20 THE WITNESS: Maybe, because, you know -- just
21 on the right, you know. *when you're in the right*

22 BY MR. WARD:

23 Q I don't understand your answer, Mr. Navarro.

24 A If we know that what they are fighting for
25 against Andrew Dodge is right, so why not help them and

1 also help the company also --

2 Q Do you think --

3 A -- to correct the wrong things that
4 Andrew Dodge did.

5 Q And do you think signing a petition about
6 Andrew Dodge might undermine Andrew Dodge's authority
7 with nonsupervisory employees?

8 A They are the ones who are signing that. They
9 know the bad things that Andrew Dodge was doing to me;
10 and, also, the things he was doing against the fucler,
11 that was not good.

12 Q My question is different. My question is did
13 you think signing a petition against Andrew Dodge might
14 undermine Andrew Dodge's authority?

15 MR. URIARTE: Objection. Vague and ambiguous.

16 THE WITNESS: Maybe not, sir.

17 BY MR. WARD:

18 Q Maybe not or no?

19 A No, no (In English).

20 THE INTERPRETER: This is the interpreter. I
21 interpreted "not" and "no" the same word.

22 THE WITNESS: No, sir.

23 BY MR. WARD:

24 Q Why not?

25 A ~~If what's being said is the ones that is~~

*Because the petition states the wrong
things that he was doing to the fuclers*

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1 BY MR. WARD:

2 Q Okay. And when did you make these complaints
3 yourself about Andrew Dodge?

4 A I no longer remember the date, but I told
5 Randy Davis.

6 Q Anyone other than Randy?

7 THE INTERPRETER: I'm sorry. I didn't hear
8 that.

9 BY MR. WARD:

10 Q Anyone other than Randy?

11 A There were Nico, John Qually, and also Renil
12 and Tracy.

13 MR. URIARTE: Did you say Nicole?

14 THE WITNESS: Nico. Nico.

15 MR. URIARTE: Can you spell that.

16 THE WITNESS: Nico, N-i-c-o (In English).

17 THE INTERPRETER: This is the interpreter.

18 It's not Nicole but Nico, N-i-c-o.

19 BY MR. WARD:

20 Q All right. Other than Randy, Nico, Tracy, and
21 Renil, is there anyone else at Menzies/ASIG that you
22 told?

23 MR. URIARTE: I think, Chris, you are
24 misstating John Qually, and then the interpreter missed
25 saying Renil.

1 The reporter just clarified for me that
2 documents Bates No. -152 to -154 I had marked as
3 Exhibit 7, but it should actually be 8; is that right?

4 THE REPORTER: Yes.

5 MR. WARD: So then this document I have up
6 right now, Bates No. -150, is actually going to be
7 Exhibit 9.

8 (Deposition Exhibits 8 and 9 were marked
9 for identification by the reporter,
10 copies of which are attached hereto.)

11 BY MR. WARD:

12 Q Have you had a chance to look at Exhibit 9
13 here?

14 A I already read it, sir.

15 Q Prior to today, have you ever seen this
16 Exhibit 9?

17 A They gave me a copy.

18 Q When you say "they," who is "they"?

19 A The shop steward gave it to me, Rafael.

20 Q Did Rafael give this to you after you had
21 signed the petition?

22 A *Yes sir, this was the first*
~~I think this is the second petition, that this~~
23 ~~is the second petition they made against Andrew Dodge.~~

24 Q So is it your testimony that there were two
25 petitions against Andrew Dodge?

1 A The first one was the first one that you Yes Sir
2 showed with my signing, and I think this is the second.

3 Q Okay. Did you ever sign this second petition?

4 A I was not -- no longer able to sign it because
5 they already terminated me at that time.

6 Q I see. So this, Exhibit 9, you first saw it
7 after your termination?

8 A When they terminated me and the people signed
9 that petition, I was given a copy by Rafael.

10 Q I just want to be clear though. The copy of
11 this, Exhibit 9 that you received from Rafael, did you
12 receive that before or after your termination?

13 A I was already terminated.

14 Q Okay. Did you ever have any text-message
15 communication with Mr. Dodge about the petition against
16 him?

17 A No, sir.

18 MR. WARD: I'm going to mark this as
19 Exhibit 10, and this is Bates-numbered -88.

20 (Deposition Exhibit 10 was marked for
21 identification by the reporter, a
22 copy of which is attached hereto.)

23 BY MR. WARD:

24 Q On the lower half of the page, Mr. Navarro, it
25 looks like a screen capture of some text messages.

1 BY MR. WARD:

2 Q And the nonsupervisory employees gave
3 Exhibit 9 to the union shop steward, to your
4 understanding; correct?

5 A No. My understanding is the shop steward who
6 prepared the letter, and then the union submitted it to
7 the company. That's what I know.

8 Q And what is the name of the shop steward?

9 A Rafael.

10 Q And is this the same Raul whose last name you
11 do not remember?

12 A ~~Yes, sir.~~ *No*

13 Q Do you currently possess a cell phone,
14 Mr. Navarro?

15 A Yes, sir.

16 Q And did you possess a cell phone in 2018 while
17 you were employed by Menzies?

18 A Yes, sir.

19 Q And is the cell phone that you currently
20 possess the same cell phone that you used in 2018 while
21 you were employed by Menzies?

22 A Yes, sir.

23 Q Are you still using the same device today that
24 you used in 2018?

25 A Yes, sir.

1 Q Is that a yes?

2 That's when you learned you had been
3 terminated, when you met with Tracy?

4 A Yes, sir.

5 Q Was anybody else present at the time that you
6 met with Tracy other than yourself and Tracy?

7 A She was with a female there.

8 Q Was she another Menzies employer, that female?

9 A Maybe, sir.

10 Q You don't know who she was, in other words?

11 A No, sir.

12 Q So other than Tracy and this unidentified
13 female, nobody else was present; is that true?

14 A Yes, sir.

15 Q What did Menzies tell you was the reason they
16 were terminating your employment?

17 A All I remember that Tracy told me was that you
18 should not have signed it because you were at
19 management ~~site~~. side

20 Q And when she said you should not have signed
21 it, she was referring to the petition, to your
22 understanding?

23 A Yes, sir.

24 Q Were you told that there was any reason for
25 your termination other than signing the petition?